

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION

National Association for the Advancement of
Colored People, Inc. by and through its Myrtle
Beach Branch, Simuel Jones, Leslie Stevenson,
and Cedric Stevenson,

Plaintiffs,

v.

City of Myrtle Beach, a municipal corporation
within the State of South Carolina and City of
Myrtle Beach Police Department, a department
of the City of Myrtle Beach,

Defendants.

C.A. NO. 4:18-CV-00554-DCC

**DECLARATION OF RANDY WEBSTER
CHAIRMAN BIKEFEST TASK FORCE**

Declaration of Randy Webster, Chairman Bikefest Task Force, affirms the following:

1. He was selected by the Coastal Alliance to be the Chairman of the Bikefest Task Force.
2. He is employed by Horry County as the Director of Emergency Management. Horry County Emergency Management was given the responsibility to conduct the Bikefest Task Force After Action Report and Improvement Plan. Any questions concerning the After Action Report and Improvement Plan should be directed to Horry County Emergency Management.
3. The attached 2015 Memorial Day Weekend Bikefest After Action Report and Improvement Plan is a true and accurate copy of the report prepared for the Coastal Alliance.
4. The attached 2016 Memorial Day Weekend Bikefest After Action Report and Improvement Plan is a true and accurate copy of the report prepared for the Coastal Alliance.
5. A 2017 Memorial Day Weekend Bikefest After Action Report and Improvement Plan has not been prepared for the Coastal Alliance as of the date of this declaration. However, the Bikefest Task Force's goals for 2017 were met. All of the plans stress safety, coordination, and flexibility.
6. On March 14, 2018, he conducted the final 2018 public meeting of the Bikefest Task Force and all members of the task force were invited to attend together with the public in general. At the meeting, he announced that substantially the same plan would be used for Memorial Day Weekend that had been used since 2015. All local government participants at the meeting were in agreement and stated they were prepared to perform the same duties as they performed since 2015.

7. Memorial Day Weekend is a unique and extraordinary event in Horry County. The 2018 Bikefest Task Force plans are narrowly and specifically tailored to meet the public safety needs of that event. The primary goal of the Bikefest Task Force plan is public safety. . The 2018 Bikefest Task Force plans are in the best interest of all participants of Memorial Day Weekend activities.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on


Randall S. Webster
Chairman Bikefest Taskforce

March 20, 2018